



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107

65323  
NOV 7 1990

Mr. Jeff Leed  
Exide Corporation  
645 Penn Street  
Reading, PA 19601

Re: Tonolli Corporation Superfund Site  
Risk Assessment Contractor Selection

Dear Mr. Leed:

We have completed a review of the package submitted to EPA on October 31, 1990 regarding the selection of Clement International Corporation to perform the Risk Assessment ("RA") for the Tonolli Site RI/FS. At this time, we see no reason to disapprove the use of Clement for the Tonolli project. We therefore recommend that Clement be brought up to speed on the RI/FS activities as soon as possible.

Upon reviewing Clement's package with Ms. Dawn Ioven, EPA's toxicologist for the Tonolli Site, we became aware of two specific items which we must address. On page 12 (Toxicity Assessment under Section IV - Technical Approach) of the submitted package, Clement discusses their proposed approach to the evaluation of polynuclear aromatic hydrocarbons (PAHs). The model that Clement discusses in this section has not received approval by EPA, and thus will not be acceptable for the Tonolli project. EPA has withdrawn the previous cancer potency factor for benzo(a)pyrene, and is now using relative potency estimates for the PAHs. This method apparently views individual PAHs relative to benzo(a)pyrene. If Clement has any questions regarding this, please ask them to contact me or Ms. Dawn Ioven.

The second item of concern pertains to Clement's discussion of lead that appears on the same page as described above. EPA would like to offer the following for the evaluation of lead at Tonolli: Version 4 of the Biokinetic Model should be used, as well as a Geometric Standard Deviation of 1.7 (not the default of 1.4). Also, when using the Biokinetic Model for adults (i.e., workers) Clement should use an absorption rate of 5% (not 35%). As with the above recommendation, please have Clement contact us

AR300234

if there are any questions or need for clarification. It will be essential to form an open line of communication to facilitate the completion of the risk assessment.

For your reference, I am also including some reading material with this letter. This material pertains to a request received by EPA for blood testing of children in the area of the Tonolli site. While this material is mostly congressional correspondence, it is the only documentation I have of this event at this time. I will be sure to keep you posted on any new developments.

Sincerely,

*Donna M. McCartney*  
Donna M. McCartney (3HW21)  
Project Manager

Enclosures

cc: D. Ioven, 3HW15  
S. Hodges, 3RC33

AR300235